

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

DIRECT REPORT CORPORATION d/b/a  
SHAREHOLDER.COM ,

Plaintiff,

v.

CCBN.COM, INC., THE THOMSON  
CORPORATION, ROBERT I. ADLER, JOHN  
DOES 1 through 5 and JANE DOES 1 through 5,

Defendants.

Civil Action No. 04-10535-PBS

**PLAINTIFF SHAREHOLDER.COM'S MOTION TO IMPOUND ITS  
OPPOSITION TO DEFENDANT ADLER'S MOTION FOR A PROTECTIVE  
ORDER, OR, ALTERNATIVELY, TO QUASH PLAINTIFF'S SUBPOENAS TO  
INSPECT HIS PERSONAL COMPUTERS**

Pursuant to Local Rule 7.2, Plaintiff Shareholder.com moves for the impoundment of its Opposition to Defendant Adler's Motion for a Protective Order, or Alternatively, to Quash Plaintiff's Subpoenas to Inspect his Personal Computers, which is being delivered by hand to the Court today. The opposition brief contains information the defendants have designated as "Confidential." Under the parties' Stipulated Protective Order (Docket No. 37), Shareholder.com is required to seek impoundment of any documents filed with the Court containing "Confidential" information. *See* Stipulated Protective Order at ¶ 14.

Shareholder.com reluctantly moves for impoundment of its opposition brief because Shareholder.com does not believe that any information included in the brief warrants a "Confidential" designation. Mr. Adler and the corporate defendants, however,

continue to maintain that information concerning Mr. Adler's conduct is confidential, and Shareholder.com does not want to incur the burden and expense of drafting motions to seek de-designation of the hundreds of documents and transcript pages that defendants have designated. Therefore, in the absence of the defendants' agreement, Shareholder.com moves for impoundment as required by the Stipulated Protective Order.

SHAREHOLDER.COM

By its attorneys,

/s/ Melissa C. Allison

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Dated: June 1, 2005

LOCAL RULE 7.1 CERTIFICATE

Counsel for Shareholder.com certifies that they conferred with Mr. Adler's counsel and were unable to obtain his agreement to file the opposition brief without this accompanying motion for impoundment. Counsel for the corporate defendants did not respond to Shareholder.com's inquiry, but given Mr. Adler's position, Shareholder.com is obligated to move for impoundment.

/s/ Melissa C. Allison